

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2010 JUN -8 AM 10: 48

DEPUTY CLERK

RON AND ELIZABETH LANINGHAM, as §
next friend to SAMANTHA SANCHES, §
and SAMANTHA SANCHES, individually, §

Plaintiffs,

vs.

CARROLLTON-FARMERS BRANCH
INDEPENDENT SCHOOL DISTRICT,

Defendant.

CIVIL ACTION NO. 3-08CV1559-M

JURY DEMANDED

**ANDERSON TOBIN, PLLC'S MOTION TO WITHDRAW
AS COUNSEL FOR PLAINTIFFS AND BRIEF IN SUPPORT**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Anderson Tobin, PLLC f/k/a Anderson & Jones, pllc, and its attorneys (collectively, "Counsel") and file this Motion to Withdraw as Counsel and Brief in Support for Plaintiffs Ron and Elizabeth Laningham, as next friend to Samantha Sanches, and Samantha Sanches, individually (collectively, "Plaintiffs"), respectfully request the Court's permission to withdraw as attorneys of record for Plaintiffs, move for an order discharging Counsel as attorneys of record for Plaintiffs, and would show unto the Court the following:

1. Counsel respectfully request that they immediately be allowed to withdraw as counsel of record for Plaintiffs.
2. There is good cause for this Court to grant this Motion to Withdraw because Plaintiffs have informed Counsel that they no longer desire Counsel's representation in this matter.

3. Plaintiffs have consented to Counsel's immediate withdrawal, as evidenced by their signatures below and Plaintiffs' letter requesting a file transfer to Harold D. Jones' new law firm (Littler Mendelson). The transfer letter is attached hereto as Exhibit "A".

4. Counsel of record, Harold D. Jones and E. Ashley Goodwin, are no longer partners or employees of Anderson Tobin, PLLC f/k/a Anderson & Jones, pllc.

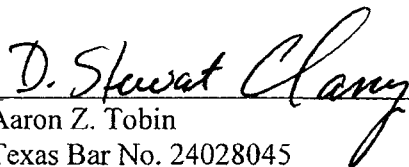
5. Counsel has delivered a copy of this Motion to Plaintiffs and has notified them in writing of their right to object to this motion.

6. Plaintiffs' last known address is 618 King Lot, Lewisville, Texas 75056.

7. Plaintiffs appealed on March 29, 2010 to the United States Court of Appeals for the Fifth Circuit. The Plaintiffs' only current deadline for the appeal is for the Appellant's Brief on July 22, 2010.

WHEREFORE, PREMISES CONSIDERED, Anderson Tobin, PLLC f/k/a Anderson & Jones, pllc, and its attorneys respectfully request that this Motion to Withdraw and Brief in Support as Counsel for Plaintiffs be in all things granted and that the Court sign its Order permitting Anderson Tobin, PLLC f/k/a Anderson & Jones, pllc and its attorneys to withdraw and be discharged as Plaintiffs' counsel of record; and for such other and further relief as Counsel is justly entitled.

Respectfully submitted,



Aaron Z. Tobin

Texas Bar No. 24028045

D. Stewart Clancy

Texas Bar No. 24027926

ANDERSON TOBIN, PLLC

One Galleria Tower

13355 Noel Road, Suite 1900


Dallas, Texas 75240

Telephone: (972) 789-1160

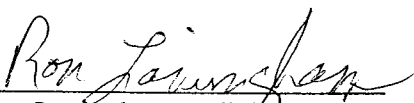
Facsimile: (972) 789-1606

ATTORNEYS FOR PLAINTIFFS

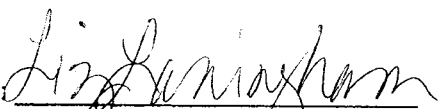
AGREED TO:

By: 

Samantha Sanches, Individually

By: 

Ron Laningham, Individually

By: 

Liz Laningham, Individually

CERTIFICATE OF CONFERENCE

I hereby certified that I communicated with Meredith Prykryl Walker, counsel of record for Carrollton-Farmers Branch Independent School District, on May 27 and June 1, 2010, and Ms. Walker does not oppose this motion.


Certified to the 7th day of June, 2010.


D. STEWART CLANCY

CERTIFICATE OF SERVICE

The undersigned certifies that on the 7th day of June 2010, a true and correct copy of the foregoing document was delivered via facsimile and certified mail, return receipt requested, to all counsel of record pursuant to the TEXAS RULES OF APPELLATE PROCEDURE.

Donald G. Henslee
Meredith Prykryl Walker
Henslee Schwartz LLP
6688 North Central Expwy., Suite 850
Dallas, TX 75260
**Attorneys for Carrollton-Farmers
Branch Independent School District**


D. STEWART CLANCY

May 10, 2010

Via Facsimile: 972.789.1606

and Via E-Mail: aaront@andersonjoneslaw.com

Aaron Tobin

Anderson+Jones, pllc

One Galleria Tower

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Dallas, Texas 75240

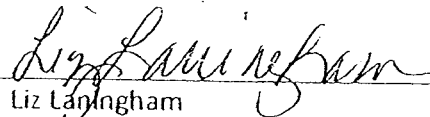
Re: *Transfer of Representation and Client Files to Harry Jones of Littler Mendelson for Civil Action No. 3-08CV1559-M; Ron and Elizabeth Laningham, as next friend of Samantha Sanches v. Carrollton-Farmers Branch Independent School District; In the United States District Court, Northern District*

Dear Aaron:

We authorize that Harold D. Jones will now represent us in school investigation matters as an attorney of Littler Mendelson and hereby request that our client files, for all labor and employment matters, be transferred to Littler Mendelson promptly. This authorization and request includes all physical files, electronic data (documents and e-mail) and other information related to our matters, described above. We also agree to cover any reasonable copying charges that may be involved in the transfer of representation and files for our benefit.

Approved by:

RON AND LIZ LANINGHAM



Liz Laningham

618 King Lot

Lewisville, Texas 75056

cc: Via Facsimile: 214.880.0181

and Via E-Mail: bkuhlke@littler.com

Barbara Kuhlke

Office Administrator

Littler Mendelson, P.C.

2001 Ross Avenue, Suite 1500

Dallas, Texas 75201

